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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. ANA PALOS-MONTES, Defendant.	Criminal Case No. 08CR1726-LAB JOINT MOTION TO CONTINUE MOTION HEARING

The plaintiff, UNITED STATES OF AMERICA, by and through its counsel, KAREN P. HEWITT, United States Attorney, and Alessandra P. Serano, Assistant United States Attorney, and defendant, Ana Palos-Montes, through her counsel, Michelle Betancourt, hereby jointly move this court to continue the motion hearing currently scheduled for Monday, July 7, 2008, at 2:00 p.m. to Monday, July 14, 2008 at 2:00 p.m. Alternatively, the parties agree to move the motion hearing to another date that fits within the Court's calendar.

The reason for this request is that the assigned Assistant U.S. Attorney is scheduled to be out of the district from July 1-8, 2008 on a pre-paid vacation using non-refundable airline tickets. It is anticipated that while there are no motions currently on file as of this filing, that Defendant will file motions that require an evidentiary hearing and that the assigned prosecutor will be in the best position to present witnesses and respond to the motions that deal with this specific case.

Government counsel left a voice message with Ms. Betancourt on June 11, 2008. On June 12, Ms. Betancourt responded via voicemail stating she had no objection the brief continuation of the motion hearing date.

Dated: June 12, 2008.

s/Alessandra P. Serano
ALESSANDRA P. SERANO
Assistant U.S. Attorney

Dated: June 12, 2008.

s/ Michelle Betancourt
MICHELLE BETANCOURT
Counsel for Defendant

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. ANA PALOS-MONTES, Defendant.	)	Case No. 08CR1726-LAB CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT:

I, ALESSANDRA P. SERANO, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the Joint Motion to Continue Motion Hearing on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Michelle Betancourt, Esq.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12, 2008.

s/Alessandra P. Serano
ALESSANDRA P. SERANO